



DECLARATION OF HEATHER H. FAN

I, Heather H. Fan, declare:

1. I am an attorney licensed to practice in the State of California and am an associate with the law firm of Howrey LLP, attorney of record for Defendants Tatung Company; Tatung Company Of America, Inc., Chunghwa Picture Tubes, Ltd. and ViewSonic Corporation.

2. I have first hand knowledge of the facts set forth herein and, if called and sworn as a witness, I could and would testify competently and from personal knowledge as to these facts. I submit this declaration in support of Defendants' Motion to Restrict Access to Trial During the Presentation of Certain Confidential Information and For An Order Sealing Corresponding Portions of the Trial Transcript.

3. Mask files are highly confidential design documents that explain the processes and structure of the manufacturing process. Defendants produced mask files in this case describing their proprietary production process for CPT's LCD panels in response to its discovery obligations. Plaintiffs included 11 of these as Trial Exhibits. These are Plaintiff's Exhibit Nos. Exhibit Nos. 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 129.

4. Defendants also produced other confidential documents that Plaintiff's intend to use as trial exhibits. Plaintiff's Exhibit Nos. 17, 18, 19, 41, 44, 45, 46, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 68, 69, 70, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 89, 90, 91, 92, 94, 95, 96, 97, 98, 99, 100, 101, 107, 110, 111, 112, 113, 114, 115, 116, 117, 118, 120, 121, 124, 125, 126, 130, 131, 132, and 133 are marked "Attorney's Eyes Only". Plaintiff's Exhibit Nos. 14, 15, 16, 37, 38, 39, 40, 71, 84, 102, 103, and 123 are marked exhibits "Confidential". Plaintiff's Exhibit No. 36 is designated "Confidential/Attorney's Eyes Only," Exhibit No. 108 is designated

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"Highly Confidential," and Exhibit No. 109 is designated "Highly Confidential/Attorney's Eyes Only."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration is executed on July 17, 2006, at Wilmington, Delaware.

  
\_\_\_\_\_  
Heather H. Fan

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

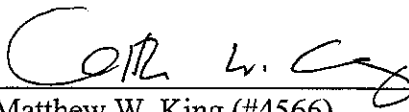
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 17, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing, and hand delivered to the following:

Richard D. Kirk  
The Bayard Firm  
222 Delaware Avenue, Suite 900  
P.O. Box 25130  
Wilmington, DE 19899

I hereby certify that on July 17, 2006, I sent the foregoing document by Electronic Mail, to the following non-registered participants:

Gaspare J. Bono  
Matthew T. Bailey  
Andrew J. Park  
Adrian Mollo  
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1900 K Street, NW  
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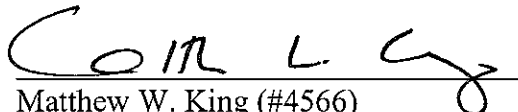
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 20, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing, and hand delivered to the following:

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